



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

John Wilson, Treasurer
NEA Fund for Children and Public Education
1201 16th Street, NW, Suite 421
Washington, DC 20036

MAY 14 2003

Identification Number: C00003251

Reference: 12 Day Pre-General Report (10/1/02-10/16/02)

Dear Mr. Wilson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report discloses one or more contributions to Friends of Sherwood Boehlert for the retirement of debts incurred by the 2002 Primary election campaign; however, it appears that the recipient committee(s) had insufficient debts to warrant such a contribution. Please note that a committee may only designate contributions to retire a candidate's debts if those debts exist.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, refunds are reported on Line 16

of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule B supporting Line 29 (pertinent portion(s) attached) discloses \$800,000 in disbursements to NEA Fund for Children and Public Education NFA for "Transfers to Affiliated Non-Federal Account". You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 29 were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, or as independent expenditures on Schedule E supporting Line 24. 11 CFR §§104.3(b)(3) and 106.1

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott Walker
Senior Campaign Finance Analyst
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)
for each category of the
Detailed Summary Page

 FOR LINE NUMBER:
(check only one)

PAGE 34 / 35

<input type="checkbox"/> 21a	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input checked="" type="checkbox"/> 29

Any information copied from such Reports and Disbursements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in full)

NEA Fund for Children and Public Education Federal Account

Full Name (Last, First, Middle Initial)

A. Maine Democratic Party Non-Federal Account

Mailing Address

PO Box 5268

City

Augusta

State

ME

Zip Code

04332

Purpose of Disbursement

Contribution: NE State Cmte

Candidate Name

 Category
Type

Office Sought

House

Senate

President

Disbursement For

Primary

General

Other (specify)

State: ME

District

Date of Disbursement

10 / 16 / 2002

Amount of Each Disbursement This Period

10000.00

 Contribution: NE State
Cmte

Transaction ID: 013428

Full Name (Last, First, Middle Initial)

B. NEA Fund for Children and Public Education NEA

Mailing Address

1201 18th St NW Ste 421

City

Washington

State

DC

Zip Code

20036-3200

Purpose of Disbursement

Transfer to Affiliated Non-Federal Account

Candidate Name

 Category
Type

Office Sought

House

Senate

President

Disbursement For

Primary

General

Other (specify)

State:

District

Date of Disbursement

10 / 08 / 2002

Amount of Each Disbursement This Period

800000.00

 Transfer to Affiliated Non-
Federal Account

Transaction ID: 013605

C.

SUMMARY of Disbursements This Page (optional) \$10000.00

TOTAL This Period (last page only use number only) \$10000.00

Fec Schedule B (Revised 10/01)

